

Venkat Balasubramani, OSB No. 180446
venkat@focallaw.com
Stacia N. Lay, WSBA #30594 (*Pro Hac Vice*)
stacia@focallaw.com
Kimberlee Gunning, WSBA #35366 (*Pro Hac Vice*)
kim@focallaw.com
FOCAL PLLC
900 1st Avenue S., Suite 201
Seattle, Washington 98134
Telephone: (206) 529-4827

Clifford S Davidson, OSB No. 125378
csdavidson@swlaw.com
SNELL & WILMER L.L.P.
1455 SW Broadway, Suite 1750
Portland, Oregon 97201
Telephone: 503.624.6800
Facsimile: 503.624.6888
Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

A.M., an individual,

Plaintiff,

vs.

OMEGLE.COM LLC,

Defendant.

Case No. 3:21-cv-01674-MO

**JOINT MOTION FOR EXTENSION OF
DISCOVERY & PTO DEADLINES**

JOINT MOTION

Pursuant to Fed. R. Civ. P. 16, LR 16-3 and the Court's order of May 3, 2022 (ECF No. 28), the parties jointly move to extend discovery and pretrial order deadlines (*see* ECF No. 4) as follows:

First Amended Complaint filed	May 5, 2022
Response to First Amended Complaint	May 26, 2022
Rule 26(f) conference of counsel	July 5, 2022
Amendment of pleadings and joining of all parties	September 30, 2022
Completion of discovery	January 3, 2023
Filing dispositive motions	February 2, 2023
Joint ADR report	March 6, 2023
Expert disclosures/discovery	Per Rule 26
Proposed pretrial order	To be set when trial date is set

Good cause supports modification of pretrial deadlines as this litigation has only just begun and the pleadings are not yet settled. The parties have used prior time effectively; they were engaged in dispositive motions practice. LR 16-3(a)(1)-(2). There are no imminent current deadlines, and neither party would suffer prejudice by establishing the agreed-upon schedule. LR 16-3(a)(4).

CONCLUSION

For the foregoing reasons, the Court should modify the Pretrial Order (ECF No. 4) as set forth above.

Dated this 5th day of May, 2022.

SNELL & WILMER L.L.P.

s/ Clifford S. Davidson

Clifford S. Davidson, OSB No. 125378
csdavidson@swlaw.com

and

Venkat Balasubramani, OSB No. 180446
venkat@focallaw.com
Stacia N. Lay, WSBA #30594 (*Pro Hac Vice*)
stacia@focallaw.com
Kimberlee Gunning, WSBA #35366 (*Pro Hac Vice*)
kim@focallaw.com
FOCAL PLLC
900 1st Avenue S., Suite 201
Seattle, Washington 98134
T: (206) 529-4827

Attorneys for Defendant

Dated this 5th day of May, 2022.

VOGT & LONG PC

s/ Barbara C. Long

Barbara C. Long, OSB No. 122428
barb@vogtlong.com

and

Carrie Goldberg (*pro hac vice*)
carrie@cagoldberglaw.com
Naomi Leeds (*pro hac vice*)
naomi@cagoldberglaw.com
C.A. GOLDBERG PLLC
16 Court Street 33rd Floor
Brooklyn, NY 11241
T: (646) 666-8908

Attorneys for Plaintiff